

MARQUIS AURBACH COFFING

10001 Park Run Drive
Las Vegas, Nevada 89145
(702) 382-0711 FAX: (702) 382-5816

Marquis Aurbach Coffing

Terry A. Coffing, Esq.
Nevada Bar No. 4949
James A. Beckstrom, Esq.
Nevada Bar No. 14032
10001 Park Run Drive
Las Vegas, Nevada 89145
Telephone: (702) 382-0711
Facsimile: (702) 382-5816
tcoffing@maclaw.com
jbeckstrom@maclaw.com
Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ALLISON STONE, an individual; and
KARINA DJALILOVA, an individual,

Plaintiffs,

vs.

YASIN TOURAY, an individual; HBTL
TOURING, LLC, a Delaware limited liability
company; BRIDGING THE GAP
MANAGEMENT, LLC, a Delaware limited
liability company; ARTIST DUBOSE, a/k/a
“A BOOGIE WIT DA HOODIE”; and DOES
I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

Defendants.

Case Number:
2:19-cv-01945-JAD-VCF

STIPULATION FOR ADDITIONAL 30
DAY STAY OF PROCEEDINGS
SUBMITTED PURSUANT TO
ECF NO. 39

ECF No. 45

Plaintiffs Allison Stone and Karina Djalilova (“Plaintiffs”), Defendant Yasin Touray (“Touray”), and Defendants HBTL Touring, LLC (“HBTL”), Bridging The Gap Management, LLC (“BTGM”) and Artist Dubose a/k/a “A Boogie Wit Da Hoodie” (“Artist”) by and through their respective counsel of record, hereby submits the Joint Interim Status Report and Discovery Plan and Scheduling Order pursuant to the Minutes of the Court (ECF No. 39) and for the Court’s approval. The parties met and conferred via phone on **May 18, 2020**.

1. On March 19, 2020, the HBTL, BTGM, Touray, and Plaintiffs stipulated to stay proceedings as a result of the events associated with the COVID-19 outbreak, which triggered a series of Shelter in Place orders and travel restrictions across the country. (ECF

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1 No. 39). This stipulation was primarily based on the fact all of the parties and crucial fact
2 witnesses to this case reside outside of Nevada, and travel for depositions out of state was
3 infeasible.

4 2. During the May 18, 2020 call, HBTL, BTGM, and Plaintiffs agreed that an
5 additional 30-day stay was necessary based on the continuing crisis associated with COVID-
6 19.

7 3. On April 14, 2020, this Court upon Motion by Touray's prior counsel granted
8 a Motion to Withdraw as Counsel. As a result, Touray is *pro se*.

9 4. On May 19, 2020, Plaintiff's counsel contacted Touray by e-mail to discuss a
10 continuation of the current stay. Touray contacted Plaintiffs' counsel and agreed to the stay
11 by telephone. A copy of this stipulation was e-mailed to Touray.

12 5. Touray continues to have pending criminal proceedings in the Eighth Judicial
13 District Court, with an unknown trial date.

14 6. Pursuant to this Court's request, this Status Report is provided jointly by the
15 Parties.

16 7. All parties subject to discovery in this case reside in California, New York,
17 New Jersey, or Georgia. Currently, each of these states remain subject to a variety of stay at
18 home orders as a result of COVID-19.

19 8. HBTL, BTGM, Touray, and Plaintiffs agree that the condition of New York
20 and California continue to make travel and coordination of depositions infeasible at this time.

21 9. As a result, an additional stay of this case for approximately **30 days**, or until
22 **June 30, 2020**, is sought.

23 10. This request is based on the fact that at this point of the litigation, depositions
24 of these out of state witnesses are a necessary pre-requisite to additional discovery to advance
25 this case to trial, including the retention of costly expert witnesses. While remote depositions
26 have been considered, the witnesses subject to those depositions still require additional time
27

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1 to address issues associated with COVID-19 and the related orders, prior to deciding how to
2 best proceed.

3 11. HBTL, BTGM, Touray, and Plaintiffs also agree the deposition testimony of
4 these out of state witnesses is a necessary pre-requisite for expected retained expert witnesses,
5 including standard of care experts and retained expert physicians.

6 12. Moreover, HBTL, BTGM, Touray, and Plaintiffs agree that depositions for
7 treating physicians at Sunrise Hospital and Cedar Sinai Hospital, which are crucial to the
8 alleged damages at issue to this case, would also be infeasible in the next 30 days based on
9 the current healthcare crisis.

10 13. The HBTL, BTGM, Touray, and Plaintiffs further agree that based on the
11 above stated difficulties, judicial economy supports staying all discovery and related deadlines
12 for approximately **30 days**, or until **June 30, 2020**.

13 14. Thereafter, on June 30, 2020, HBTL, BTGM, Touray, and Plaintiffs will file a
14 supplemental status report to this Court following a meet and confer to reset all pertinent
15 discovery dates and dispositive deadlines.

16 Dated this 20th day of May, 2020

Dated this 20th day of May, 2020

17 BENDAVID LAW

MARQUIS AURBACH COFFING

18
19 By: /s/ Stephanie J. Smith
Jeffery Bendavid, Esq.
Stephanie J. Smith, Esq.
7301 Peak Drive, Suite 150
Las Vegas, Nevada 89128
Attorney for HBTL Touring LLC,
22 Bridging the Gap Management, LLC

By: /s/ James A. Beckstrom
Terry A. Coffing, Esq.
James A. Beckstrom, Esq.
10001 Park Run Drive
Las Vegas, Nevada 89145
Attorneys for Plaintiffs

23 Dated this 20th day of May, 2020

24 YASIN TOURAY

25
26 By: /s/ Yasin Touray
Yasin Touray
27 Pro se

ORDER

Based on the parties' stipulation [ECF No. 45] and good cause appearing, IT IS HEREBY ORDERED that **the stay of this action is extended to 6/30/2020 for all purposes**. The parties have until 7/1/2020 to file a joint status report and joint proposed amended scheduling order and discovery plan.



U.S. District Judge Jennifer A. Dorsey
Dated: May 29, 2020

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